

1 through its attorneys, hereby applies to this Court for an Ex Parte Order granting this Application¹ and
2 entering the Proposed Order pursuant to 28 U.S.C. § 1782: (i) authorizing Applicant to serve Marc L.
3 Abramowitz with the subpoenas attached as Exhibits A and B to the Bukowski Declaration, (ii)
4 directing Marc L. Abramowitz to produce documents responsive to the subpoena, (iii) directing
5 Mr. Abramowitz to appear for a deposition, (iv) directing Mr. Abramowitz to preserve evidence, and
6 (v) such other relief as this Court deems just and proper.

7 Applicant respectfully requests that the Court order the production of documents
8 specified to the subpoena, unless otherwise agreed by the parties, on or before August 31, 2018.

JURISDICTION

This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1782. The Court has personal jurisdiction over the object of the application because Mr. Abramowitz resides in the state of California, county of San Francisco.

4 | DATED: August 10, 2018

/s/ Christopher A. Stecher

CHRISTOPHER A. STECHER
KEESAL, YOUNG & LOGAN

TIMOTHY P. HARKNESS (*pro hac vice*)
DAVID Y. LIVSHIZ (*pro hac vice*)
WERONIKA BUKOWSKI (*pro hac vice*)
FRESHFIELDS BRUCKHAUS DERINGER US LLP

Pro Hac Vice Applications Forthcoming

Attorneys for Applicant
Palantir Technologies, Inc.

¹ An ex parte application pursuant to 28 U.S.C. § 1782 is appropriate and is the typical procedure when invoking this statute. See, e.g., In re Ecuador, No C-10-80225 MISC CRB (EMC), 2010 U.S. Dist. LEXIS 102158, at *7 (N.D. Cal. Sept. 15, 2010) (“[I]t is common for the process of presenting the request to a court and to obtain the order authorizing discovery to be conducted *ex parte*. Such *ex parte* applications are typically justified by the fact that the parties will be given adequate notice of any discovery taken pursuant to the request and will then have the opportunity to move to quash the discovery or to participate in it.”) (Internal quotations and citations omitted).